

**EXHIBIT E**  
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16 UNITED STATES DISTRICT COURT  
17 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION  
18

19 ELECTRIC SOLIDUS, INC. d/b/a  
20 SWAN BITCOIN, a Delaware  
21 corporation,

22 Plaintiff,

23 v.

24 PROTON MANAGEMENT LTD., a  
25 British Virgin Islands corporation;  
26 THOMAS PATRICK FURLONG;  
27 ILIOS CORP., a California corporation;  
28 MICHAEL ALEXANDER HOLMES;  
29 RAFAEL DIAS MONTELEONE;  
30 SANTHIRAN NAIDOO; ENRIQUE  
31 ROMUALDEZ; and LUCAS  
32 VASCONCELOS,

33 Defendants.

Case No. 2:24-cv-08280-MWC-E

**DEFENDANT PROTON  
MANAGEMENT LTD.'S  
SUPPLEMENTAL RESPONSES  
AND OBJECTIONS TO  
PLAINTIFF'S FIRST TARGETED  
INTERROGATORIES**

Am. Complaint filed: January 27, 2025

1 PROPOUNDING PARTY: Plaintiff ELECTRONIC SOLIDUS, INC. d/b/a SWAN  
2 BITCOIN

3 RESPONDING PARTY: Defendant PROTON MANAGEMENT LTD.

4 SET NO.: One (1)

5 Pursuant to Federal Rule of Civil Procedure 33, Defendant PROTON  
6 MANAGEMENT LTD. (“Responding Party”) submits these responses and  
7 objections to the First Set of Targeted Interrogatories (“Interrogatories”)  
8 propounded by Plaintiff ELECTRONIC SOLIDUS, INC. d/b/a SWAN BITCOIN  
9 (“Propounding Party”).

10 **PRELIMINARY STATEMENT**

11 The following responses are made solely for the purpose of, and in relation to,  
12 the Action. Each response is provided subject to all appropriate objections  
13 (including, without limitation, objections concerning competency, relevancy,  
14 materiality, propriety, and admissibility) that would require the exclusion of any  
15 statement contained herein if the statement were made by a witness present and  
16 testifying in court. All such objections and grounds therefor are reserved and may  
17 be interposed at the time of trial.

18 The following responses to the Interrogatories are based upon the facts and  
19 information presently known and available to Responding Party. Discovery,  
20 investigation, research, and analysis are still ongoing in this case and may disclose  
21 the existence of additional facts, add meaning to known facts, establish entirely new  
22 factual or legal contentions, or possibly lead to additions, variations, or changes to  
23 these responses. Without obligating itself to do so, Responding Party reserves the  
24 right to change or supplement these responses as additional facts are discovered,  
25 revealed, recalled, or otherwise ascertained, and as further analysis and research  
26 disclose additional facts, contentions, or legal theories which may apply.

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**GENERAL OBJECTIONS TO INTERROGATORIES**

1  
2 1. Responding Party objects to the Interrogatories in their entirety, and to  
3 each individual interrogatory therein, on the grounds that they were not properly  
4 served. Responding Party received the Interrogatories as a redacted attachment to  
5 the Joint 26(f) Report (Dkt. 115-2). The Interrogatories were not “served via  
6 electronic mail to counsel for Defendants” as stated in the Certificate of Service  
7 attached to the Interrogatories.

8 2. Responding Party objects to the Interrogatories in their entirety, and to  
9 each individual interrogatory therein, to the extent that they purport to require  
10 Responding Party to provide information concerning persons or entities other than  
11 Responding Party, on the grounds that the Interrogatories, to that extent, are  
12 overbroad and seek information that is neither relevant to the subject matter of this  
13 Action nor reasonably calculated to lead to the discovery of admissible evidence, or  
14 if relevant, so remote therefrom as to make their disclosure of little or no practical  
15 benefit to Plaintiff, while placing an unwarranted and extreme burden and expense  
16 on Responding Party in ascertaining, gathering and providing such information.

17 3. Responding Party objects to the Interrogatories in their entirety and to  
18 each individual interrogatory therein, to the extent that they seek information that is  
19 not relevant and does not appear reasonably calculated to lead to the discovery of  
20 admissible evidence.

21 4. Responding Party objects to the Interrogatories in their entirety and to  
22 each individual interrogatory therein, to the extent that they purport to require  
23 Responding Party to provide information that is not within its possession, custody,  
24 or control.

25 5. Responding Party objects to the Interrogatories in their entirety, and to  
26 each individual interrogatory therein, to the extent they purport to require  
27 Responding Party to provide information that has already been provided by parties  
28 in this Action, or that could be provided by parties to this Action, or non-parties.

6. Responding Party objects to the Interrogatories in their entirety and to each individual interrogatory therein, to the extent that they are vague, ambiguous, and/or overbroad.

7. Responding Party objects to the Interrogatories in their entirety and to each individual interrogatory therein, to the extent that they purport to require Responding Party to provide confidential business, financial, proprietary, or sensitive information.

8. Responding Party objects to the Interrogatories in their entirety, and to each individual interrogatory therein, to the extent they seek information prepared in anticipation of, or in connection with this Action, or information protected from disclosure by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege against disclosure.

9. Responding Party objects to the Definitions set forth in the Interrogatories to the extent that such definitions purport to impose requirements on Responding Party which differ from those set forth set forth in the Code of Civil Procedure.

10. Responding Party objects to the Definitions set forth in the Interrogatories to the extent that the definitions of the stated terms or phrases assume facts not in evidence or otherwise improperly or incorrectly define the stated terms or phrases.

11. The foregoing General Objections are, and shall be deemed to be, incorporated in full into each specific Interrogatory Response set forth below.

### **OBJECTIONS TO DEFINITIONS**

1. Responding Party objects to the definition of “Communication” as overly broad, unduly burdensome, vague, ambiguous and unintelligible to the extent it includes “whether or not the Communication was ever disclosed, sent, or transmitted.” For purposes of responding to the Interrogatories, Responding Party will exclude the portion noted above from the definition of “Communications” in the

1 Interrogatories, and interpret the otherwise overbroad definition not to impose a  
2 burden beyond what is required by the Federal Rules of Civil Procedure, the Federal  
3 Rules of Evidence, and the Local Civil Rules of the U.S. District Court for the Central  
4 District of California.

5       2. Responding Party objects to the definition of “Defendant” and  
6 “Defendants” as overly broad, unduly burdensome, vague, ambiguous and  
7 unintelligible to the extent that it includes Responding Party’s “members, employees,  
8 representatives, officers, directors, managers, agents, attorneys, assigns, predecessors,  
9 affiliates, parents, subsidiaries, and any other entities or Persons acting or purporting  
10 to act on their behalf.” For purposes of responding to the Interrogatories, Responding  
11 Party will interpret “Defendant” and “Defendants” as referring to the named  
12 Defendants.

13       3. Responding Party object to the definition of “You”, “Your”, “Yourself”,  
14 or “Proton” as overly broad, unduly burdensome, vague, ambiguous and unintelligible  
15 to the extent that it includes “any of its members, employees, representatives, officers,  
16 directors, managers, agents, attorneys, assigns, predecessors, affiliates, parents,  
17 subsidiaries, and any other entities or Persons acting or purporting to act on its  
18 behalf.” For purposes of responding to the Interrogatories, Responding Party will  
19 interpret “Proton” as referring to Defendant Proton Management Ltd.

20       4. Responding Party objects to the definition of “Elektron Energy” as  
21 overly broad, unduly burdensome, vague, ambiguous and unintelligible to the extent  
22 that it includes “any of its members, employees, representatives, officers, directors,  
23 managers, agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries,  
24 and any other entities or Persons acting or purporting to act on its behalf.” For  
25 purposes of responding to the Interrogatories, Responding Party will interpret  
26 “Elektron Energy” as referring to Elektron Management LLC or Elektron Enterprises  
27 LLC as stated in the response.

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1           5. Individual Defendants object to the definition of “Individual  
2 Defendants” as overly broad, unduly burdensome, vague, ambiguous and  
3 unintelligible to the extent that it includes “any of their members, employees,  
4 representatives, officers, directors, managers, agents, attorneys, assigns, predecessors,  
5 affiliates, parents, subsidiaries, and any other entities or Persons acting or purporting  
6 to act on their behalf.” For purposes of responding to the Interrogatories, Responding  
7 Party will interpret “Individual Defendants” as referring to the Individual Defendants.

8                           **RESPONSES TO INTERROGATORIES**

9           **INTERROGATORY NO. 1:**

10           From the time period beginning August 2, 2024 through present, identify all  
11 Bitcoin wallets to which Proton has deposited mined Bitcoin and the amounts  
12 deposited, including:

- 13                   a) each wallet address to which mined Bitcoin has been deposited and  
14                   the individuals with access to or control over each wallet; and  
15                   b) the amount of Bitcoin deposited in each wallet, and when deposited.

16 For the avoidance of doubt, this includes the Bitcoin wallets referenced in paragraphs  
17 183-185 of the Amended Complaint, as well as any Bitcoin wallets to which Proton  
18 has redirected the proceeds from the wallets described in those paragraphs of the  
19 Amended Complaint.

20           **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:**

21           Responding Party incorporates by references the General Objections and  
22 Objections to Definitions as if fully set forth herein. Responding Party objects to  
23 this interrogatory to the extent that it seeks information that is protected from  
24 disclosure by the attorney-client privilege, work product doctrine, or any other  
25 applicable privilege or protection. Responding Party also objects to this  
26 interrogatory’s demand as being compound, overbroad, overly burdensome, and  
27 harassing, and as seeking documents that are not relevant to the claims or defenses  
28 in this action. Responding Party objects to this interrogatory to the extent that it

1 purports to require Responding Party to produce information that contain  
2 confidential business, financial, proprietary, or sensitive information of Responding  
3 Party or third parties without entry of a satisfactory confidentiality order.

4 Subject to and without waiving the foregoing objections, Responding Party  
5 responds as follows: Pursuant to Federal Rule of Civil Procedure 33(d), Responding  
6 Party refers Plaintiff to the documents in its forthcoming production of documents  
7 that show the information regarding the Bitcoin wallet addresses sought by this  
8 interrogatory.

9 **INTERROGATORY NO. 2:**

10 Identify all Sites at which Proton has mined Bitcoin, and for each Site, describe  
11 on a weekly basis:

- 12 a) its location
- 13 b) number and type of ASICs deployed;
- 14 c) average hash rate;
- 15 d) downtime reports;
- 16 e) curtailment periods;
- 17 f) operational costs;
- 18 g) the amount of Bitcoin mined;
- 19 h) proceeds resulting from Bitcoin mining; and
- 20 i) all agreements with or relating to the Site, including any agreements  
21 or updates to agreements entered into since August 2, 2024.

22 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:**

23 Responding Party incorporates by references the General Objections and  
24 Objections to Definitions as if fully set forth herein. Responding Party objects to  
25 this interrogatory to the extent that it seeks information that is protected from  
26 disclosure by the attorney-client privilege, work product doctrine, or any other  
27 applicable privilege or protection. Responding Party also objects to this  
28 interrogatory's demand as being compound, overbroad, overly burdensome, and



1 harassing, and as seeking documents that are not relevant to the claims or defenses  
2 in this action. Responding Party objects to this interrogatory to the extent that it  
3 purports to require Responding Party to produce information that contain  
4 confidential business, financial, proprietary, or sensitive information of Responding  
5 Party or third parties without entry of a satisfactory confidentiality order.

6 Subject to and without waiving the foregoing objections, Responding Party  
7 responds as follows: Pursuant to Federal Rule of Civil Procedure 33(d), Responding  
8 Party refers Plaintiff to the documents in its forthcoming production of documents  
9 that show the information regarding the mining sites sought by this interrogatory.

10 **INTERROGATORY NO. 3:**

11 Explain why [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]

17 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3:**

18 Responding Party incorporates by references the General Objections and  
19 Objections to Definitions as if fully set forth herein. Responding Party objects to  
20 this interrogatory to the extent that it seeks information that is protected from  
21 disclosure by the attorney-client privilege, work product doctrine, or any other  
22 applicable privilege or protection. Responding Party objects to this interrogatory to  
23 the extent that it purports to require Responding Party to produce information that  
24 contain confidential business, financial, proprietary, or sensitive information of  
25 Responding Party or third parties without entry of a satisfactory confidentiality  
26 order.

27 Subject to and without waiving the foregoing objections, Responding Party  
28 responds as follows: [REDACTED]

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]

12 Additionally, pursuant to Federal Rule of Civil Procedure 33(d), Responding  
13 Party refers Plaintiff to the documents in its forthcoming production of documents  
14 that show the information regarding the Bitcoin wallet addresses sought by this  
15 interrogatory.

16 **INTERROGATORY NO. 4:**

17 Identify and describe any management or services relating to Bitcoin mining  
18 that You have offered to any Person, including all agreements between You and each  
19 such Person. For the avoidance of doubt, this interrogatory encompasses any  
20 management or services relating to Bitcoin mining that Elektron Energy has offered  
21 to any Person, as well as agreements between Elektron Energy and each such Person.

22 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4:**

23 Responding Party incorporates by references the General Objections and  
24 Objections to Definitions as if fully set forth herein. Responding Party objects to  
25 this interrogatory to the extent that it seeks information that is protected from  
26 disclosure by the attorney-client privilege, work product doctrine, or any other  
27 applicable privilege or protection. Responding Party also objects to this  
28 interrogatory's demand as being compound, overbroad, overly burdensome, and

1 harassing, and as seeking documents that are not relevant to the claims or defenses  
2 in this action. Responding Party further objects to this interrogatory on the grounds  
3 that it is vague, overbroad and subjects Responding Party to unreasonable and undue  
4 burden and expense. Responding Party objects to the interrogatory in its entirety  
5 and to each individual request therein, to the extent that it purports to require  
6 Responding Party to produce information that contain trade secrets of Responding  
7 Party, or other confidential business, financial, proprietary, or sensitive information  
8 of Responding Party or third parties without entry of a satisfactory confidentiality  
9 order.

10 Subject to and without waiving the foregoing objections, Responding Party  
11 responds as follows: Pursuant to Federal Rule of Civil Procedure 33(d), Responding  
12 Party refers Plaintiff to the agreements for mining services that Proton will produce  
13 in its forthcoming production of documents that show the information sought by this  
14 interrogatory.

15 **INTERROGATORY NO. 5:**

16 Describe Your relationship with Elektron Energy, including but not limited to  
17 describing Your involvement in the formation of Elektron Energy, describing Your  
18 involvement in the creation of Elektron-Energy.com, identifying any email  
19 addresses associated with Elektron Energy that You maintain or control, and  
20 identifying any GitHub accounts or repositories maintained by Elektron Energy that  
21 relate to Bitcoin mining.

22 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 5:**

23 Responding Party incorporates by references the General Objections and Objections  
24 to Definitions as if fully set forth herein. Responding Party objects to this  
25 interrogatory to the extent that it seeks information that is protected from disclosure  
26 by the attorney-client privilege, work product doctrine, or any other applicable  
27 privilege or protection. Responding Party also objects to this interrogatory's  
28 demand as being compound, overbroad, overly burdensome, and harassing, and as

1 seeking documents that are not relevant to the claims or defenses in this action.  
2 Responding Party further objects to this interrogatory on the grounds that it is vague,  
3 overbroad and subjects Responding Party to unreasonable and undue burden and  
4 expense. Responding Party also objects to this interrogatory on the grounds and to  
5 the extent that it seeks information that is not in the possession, custody or control of  
6 Responding Party and/or is equally or more readily available from another source  
7 which is more convenient, less burdensome, or less expensive. Responding Party  
8 objects to this interrogatory to the extent that it is unreasonably cumulative or  
9 duplicative of other requests for production. Responding Party objects to the  
10 interrogatory in its entirety and to each individual request therein, to the extent that  
11 it purports to require Responding Party to produce information that contain trade  
12 secrets of Responding Party, or other confidential business, financial, proprietary, or  
13 sensitive information of Responding Party or third parties without entry of a  
14 satisfactory confidentiality order. Responding Party objects that this interrogatory is  
15 vague and ambiguous, including in its use of the phrases “Your relationship with  
16 Elektron Energy”, “maintain”, and “maintained.”

17 Subject to and without waiving the foregoing objections, Responding Party  
18 responds as follows: Elektron Management LLC is a wholly owned subsidiary of  
19 Proton. Proton does not have a formal relationship with any other Elektron entity,  
20 however several individuals provide services to both Proton and Elektron  
21 Enterprises LLC. The domain name elektron-energy.com was registered on July 30,  
22 2024 before Proton was incorporated. Subsequently, agents for Proton have made  
23 revisions to the website. The GitHub repository related to Bitcoin mining used by  
24 Proton, Elektron Management LLC, and/or Elektron Enterprises LLC are Enterprise  
25 => elektron-en Organization => general-sw Repository => nxt-mining.

26 Pursuant to Federal Rule of Civil Procedure 33(d), Responding Party refers  
27 Plaintiff to the documents in its forthcoming production of documents that show the  
28 information regarding the mining sites sought by this interrogatory.

1 Dated: April 18, 2025

BERGESON, LLP

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3  
4 By: /s/ Adam C. Trigg

Adam C. Trigg

5 Attorneys for Defendant

6 PROTON MANAGEMENT LTD.  
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**CERTIFICATE OF SERVICE**

I, Adam Trigg, declare as follows:

I am an employee in Santa Clara County, the county in which the service described below occurs. My business address is 111 N. Market Street, Suite 600, San Jose, California 95113. I am over the age of eighteen (18) years and am not a party to the cause for which I am serving the document(s) named below.

I hereby certify that on April 18, 2025, I served the following document(s) described as **DEFENDANT PROTON MANAGEMENT LTD.'S SUPPLEMENTAL RESPONSES AND OBJECTIONS TO PLAINTIFF'S FIRST TARGETED INTERROGATORIES** on the parties listed in the **SERVICE LIST** a true copy thereof and served via electronically as follows:

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused such document to be sent by other electronic means to the person(s) consented to in writing—in either of which events service is complete upon filing or sending. FRCP Title II, §5(b)(2)(E).

Executed on April 18, 2025, at San Jose, California.

  
Adam C. Trigg

**SERVICE LIST**

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